

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

JOSEPH KLAYNBERG,

Debtor.

Chapter 11

Case No. 22-10165 (MG)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Luskin, Stern & Eisler LLP hereby appears as counsel for Manufacturers and Traders Trust Company (“M&T”) in connection with the above-referenced proceeding pursuant to section 1109(b) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), and requests that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

Stephan E. Hornung
LUSKIN, STERN & EISLER LLP
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White Plains, New York 10606
Telephone: (212) 597-8200
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PLEASE TAKE FURTHER NOTICE that, in accordance with 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any petition, pleading, complaint, conference, hearing, application, motion, request, or demand (collectively, the “Filings”), whether formal or informal, written or oral, or transmitted or conveyed by mail,

delivery, telephone, telecopy, or otherwise which affect or seek to affect in any way any rights or interests of the M&T.

PLEASE TAKE FURTHER NOTICE that the filing of this Notice of Appearance shall not constitute (a) a waiver of the right of M&T to contest service of any Filing; (b) a waiver of rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (c) a waiver of rights to trial by jury in any proceeding as to any and all matters so triable; (d) a waiver of rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; (e) a waiver of any rights, claims, actions, defenses, setoffs, or recoupments all of which M&T expressly reserves; or (f) a consent by M&T to the jurisdiction of the United States Bankruptcy Court for the Southern District of New York with respect to any proceeding commenced in these cases against or otherwise involving M&T.

Dated: White Plains, New York
March 7, 2022

LUSKIN, STERN & EISLER LLP

/s/ Stephan E. Hornung
Stephan E. Hornung
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*Counsel for Manufacturers and Traders Trust
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March, 2022, I caused a true and correct copy of the foregoing Notice of Appearance and Request for Service of Notices and Papers to be filed and served through ECF notification upon all parties who receive notice in this matter pursuant to the Court's ECF filing system.

/s/ Stephan E. Hornung

Stephan E. Hornung